

LAW OFFICES

PETER G. ANGELOS

A PROFESSIONAL CORPORATION

ONE CHARLES CENTER

100 N. CHARLES STREET

22ND FLOOR

BALTIMORE, MARYLAND 21201-3804

(410) 649-2000 (800) 252-6622

PATRICIA J. KASPUTYS (MD) (DC)

Direct Line: 410.649.2023

FAX: 410.649.2101

[PKasputys@lawpga.com](mailto:PKasputys@lawpga.com)

OTHER OFFICES:

CUMBERLAND, MARYLAND

TOWSON, MARYLAND

HARRISBURG, PENNSYLVANIA

BETHLEHEM, PENNSYLVANIA

PHILADELPHIA, PENNSYLVANIA

NEW YORK, NEW YORK

KNOXVILLE, TENNESSEE

May 30, 2017

VIA E-FILING ONLY

Honorable Jennifer C. Boal  
Chief Magistrate Judge  
U.S. District Court, District of Massachusetts  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way  
Suite 2300  
Boston, Massachusetts 02210

RE: New England Compounding Pharmacy, Inc.  
Civil Action No. MDL 1:13-md-02419 RWZ

Dear Judge Boal:

The undersigned are respective counsel for the eight New England Compounding Pharmacy, Inc., ("NECC") MDL Plaintiffs, and Defendants, Box Hill Surgery Center, LLC, Ritu T. Bhambhani, M.D. and Ritu T. Bhambhani, M.D., LLC. The Third Amended Scheduling Order [Dkt 3301] provides for a June 1, 2017, deadline for completion of case-specific fact discovery in the Box Hill cases. We write to advise that due to scheduling difficulties, some of the case-specific depositions in the Dreisch and Kashi bellwether cases will need to be conducted after the discovery deadline. The parties believe that this will not affect the other deadlines set forth in said Scheduling Order. We jointly propose a new deadline of August 4, 2017, to complete case-specific fact discovery in these bellwether cases.

May we please have the Court's permission for this variance?

Respectfully submitted,

/s/ Gregory K. Kirby  
Catherine W. Steiner  
Gregory K. Kirby  
PK Law  
901 Dulaney Valley Road  
Suite 500

/s/ Patricia J. Kasputys  
Patricia J. Kasputys  
Jay D. Miller  
Glenn E. Mintzer  
Sharon L. Houston  
Law Offices of Peter G. Angelos, P.C.

LAW OFFICES

PETER G. ANGELOS

A PROFESSIONAL CORPORATION

Baltimore, Maryland 21204  
410-938-8800  
410-832-5600 (Fax)

*Attorneys for Defendants  
Box Hill Surgery Center, LLC  
Ritu T. Bhambhani, M.D.  
Ritu T. Bhambhani, M.D., LLC*

100 North Charles Street  
Baltimore, Maryland 21201  
410-649-2000  
410-649-2101 (Fax)

*Attorneys for Plaintiffs Armetta, Bowman  
Davis, Dreisch, Farthing, Kashi and  
Torbeck*

/s/ Michael Coren

Harry M. Roth  
Michael Coren  
Cohen, Placitella & Roth, P.C.  
Two Commerce Square  
2001 Market Street, Suite 2900  
Philadelphia, PA 19103  
215-567-3500  
215-567-6019 (Fax)

*Attorneys for Plaintiff Handy*